

STATEMENT OF BASIS (AI No. 98345)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0116084 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Port Ship Services, Inc.
Grand View Facility
7121 N. Peters St.
Arabi, Louisiana 70032

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Kelli Hamilton

DATE PREPARED: February 11, 2008

1. PERMIT STATUS**A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permit - LPDES permit effective date: April 1, 2003
LPDES permit expiration date: March 31, 2008
EPA has not retained enforcement authority.

C. Date Application Received: November 1, 2007

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - water taxi facility**

The facility is primarily engaged in furnishing water transportation of passengers (e.g. ship's crew and pilot) and ship equipment.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: III
4. SIC code: 4489, 4449

C. LOCATION - 2095 Jefferson Hwy. in Lutcher, St. James Parish
Latitude 30°02'32", Longitude 90°41'14"

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3. OUTFALL INFORMATION

Outfall 001

Discharge Type: treated bilge water from company boats
Treatment: oil/water separator
Location: at the point of discharge from the oil/water separator
(Latitude 30°02'31", Longitude 90°41'10")
Flow: 50 gpd
Discharge Route: Mississippi River

Outfall 002

Discharge Type: treated sanitary wastewater
Treatment: package aeration treatment unit with chlorination
Location: at the point of discharge from the sanitary treatment system
(Latitude 30°02'33", Longitude 90°41'10")
Flow: 200 gpd
Discharge Route: Mississippi River

4. RECEIVING WATERS

STREAM - Mississippi River

BASIN AND SEGMENT - Mississippi River Basin, Segment 070301

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
d. drinking water supply

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Summary of Proposed Changes From the Current LPDES Permit: Increase monitoring frequency to 1/quarter for Outfall 002.

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

No records of recent compliance actions were found.

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B. DMR Review/Excursions - DMRs were reviewed from January 2006 to December 2007. The excursions are as follows:

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
12/06	BOD	002	1284	45
12/06	Fecal Coliform	002	60,000	400
5/07	BOD	002	79	45
5/07	TSS	002	256	45
5/07	Fecal Coliform	002	60,000	400
8/07	TSS	002	117	45

7. EXISTING EFFLUENT LIMITS

Outfall 001 -		Outfall 002 -	
COD	200:300	BOD	---:45 mg/l
Oil and Grease	---:15 mg/l	TSS	---:45 mg/l
pH	6-9	Fecal Coliform	--:400 col/100ml
		pH	6-9

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated 10/24/07 from Boggs (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

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10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

12. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC 33:IX.2341.B.14.h, "transportation facilities classified as SIC 40, 41, 42, 43, 44, 45, and 5171 which have vehicle maintenance shops, equipment cleaning operations, or airport deicing operations," need coverage for storm water discharge associated with industrial activity. An SWP3 is not included in the permit since there is no potential for storm water contamination from these processes.

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Rationale for Port Ship Services, Inc.

1. Outfall 001 treated bilge water from company boats (estimated flow is 50gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow (GPD)	Report:Report	
COD	200:300 mg/l	BPJ; similar discharges
Oil & Grease	---:15 mg/l	BPJ; similar discharges
pH	6.0 - 9.0 su	BPJ; similar discharges

Treatment: oil/water separator

Monitoring Frequency: Monthly for all parameters. (BPJ; similar discharges)

Limits Justification: BPJ; similar discharges

2. Outfall 002 treated sanitary wastewater (estimated flow is 200 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Weekly Avg. (mg/l)	<u>Reference</u>
Flow (GPD)	Report:Report	LAC 33:IX.2707.I.1.b.
BOD ₅	---:45	See limits justification (1),(2) below
TSS	---:45	See limits justification (1),(2) below
Fecal Coliform	---:400	See limits justification (1),(2) below
pH (s.u.)	6.0:9.0 (min:max)	See limits justification (2) below

Treatment: package aeration treatment unit with chlorination

Monitoring Frequency: All parameters shall be monitored once per quarter.
 Note: Increase in frequency from previous permit (1/6 month) because of non-compliance.

Limits Justification:

- 1) Sanitary wastewater regulated in accordance with LAC 33:IX.711 or LAC 33:IX.709.B - Concentration limits are used in accordance with LAC 33:IX.2363.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which expresses BOD₅ and TSS in terms of concentration. Fecal Coliform limits have been set as per LAC 33:IX.1113.C.5.iv.

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2) BPJ utilizing the LPDES Class I Sanitary General Permit

* Existing permits for similar outfalls
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

TMDL Waterbodies

Subsegment 070301, Mississippi River From Monte Sano Bayou to Head of Passes, is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.